REDACTED

FILED

JUL 27 2021

US DISTRICT COURT
DISTRICT OF DELAWARE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA   )
)
)
   v.   ) Cr. Case No. 21-53
)
)
JAMES CROSSAN   )
)
    Defendant.   )

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNT ONE

(Attempted Coercion and Enticement of a Minor)

From on or about January 20, 2019, through on or about July 16, 2019, in the State and District of Delaware, the defendant, **JAMES CROSSAN**, using any facility of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce Minor Victim 1, an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with an offense, to wit: the production of child pornography.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT ~~ONE~~ TWO   GMH 7/27/2021

(Attempted Coercion and Enticement of a Minor)

From on or about September 24, 2019, through on or about September 25, 2019, in the State and District of Delaware, the defendant, **JAMES CROSSAN**, using any facility of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce Minor Victim 2, an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with an offense, to wit: the production of child pornography.

All in violation of Title 18, United States Code, Section 2422(b).
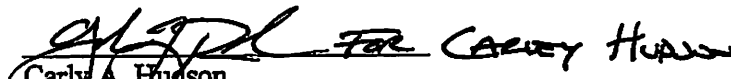
NOTICE OF FORFEITURE

Pursuant to Title 18, United States Code, Section 2428, upon conviction for violating Title 18, United States Code, Section 2422(b), as set forth in Counts One and Two of the Indictment, the defendant, **JAMES CROSSAN**, shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

A TRUE BILL:

DAVID C. WEISS
UNITED STATES ATTORNEY

By: _____

Carly A. Hudson
Assistant United States Attorney

Dated: July 27, 2021

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